

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JOHN RUDOLF,)	Civil Action No. 2:19-cv-01468-MPK
)	
Plaintiff,)	The Hon. Maureen P. Kelly
)	U.S. Magistrate Judge
v.)	
)	
AMERICAN INTERNATIONAL)	
GROUP, INC., et al.,)	
)	
Defendants.)	

**PLAINTIFF’S CONSENT MOTION FOR LEAVE
TO FILE DOCUMENT UNDER SEAL**

Plaintiff John Rudolf, by and through undersigned counsel, moves for leave to file a document under seal and, in support thereof, avers as follows:

1. Plaintiff is filing contemporaneously herewith a Motion to Compel Documents and Information.
2. Plaintiff has created Tab I in support of that Motion, which consists of two (2) performance reviews of an employee Defendants contend assumed some of Plaintiff’s job duties (M. H.).
3. As part of the Motion to Compel, Plaintiff seeks to have those 2 performance reviews unredacted as the majority is redacted.
4. Defendants consider the 2 performance reviews confidential information and pertaining to an AIG employee other than Plaintiff.
5. Defendants have requested Plaintiff to file the Tab I performance reviews under seal in accordance with the Parties’ Confidentiality Stipulation. *See* ECF No. 49, p. 5, ¶ 11.
6. Wherefore, Plaintiff respectfully requests leave of Court to file Tab I under seal.

7. An appropriate Order is attached.
8. Defendants consent to this Motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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